

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ALLISON TAKACS,)
)
Plaintiff,) Case No. 1:23-cv-1184
)
v.)
)
META PLATFORMS, INC. and META)
PLATFORMS TECHNOLOGIES, LLC,)
)
Defendants.

NOTICE OF REMOVAL

To: United States District Court
Northern District of Illinois
Eastern Division

Defendants Meta Platforms, Inc. and Meta Platforms Technologies, LLC, pursuant to 28 U.S.C. §§ 1332, 1441, and 1446 hereby remove to this Court the state court action described below that is currently pending in the Circuit Court of Cook County, Illinois, County Department, Law Division under the caption and case number *Allison Takacs v. Meta Platforms, Inc. (f/k/a Facebook, Inc.) and Meta Platforms Technologies, LLC (f/k/a Facebook Technologies LLC), d/b/a Reality Labs*, Case No. 2023 L 000086. In support of this Notice, Defendants state as follows:

1. Plaintiff Allison Takacs filed this action on January 4, 2023 in the Circuit Court of Cook County, Illinois, asserting claims for product liability, negligence, and breach of implied warranties. A copy of the Complaint and Summons served upon Defendants is attached hereto as **Exhibit A.**

2. Service upon Defendant was made on January 25, 2023. This Notice has been filed in this Court within the time allowed by law for the removal of civil actions pursuant to 28 U.S.C. § 1446(b).

3. Defendant Meta Platforms, Inc. is a corporation incorporated in the State of Delaware with a principal place of business in Menlo Park, California. (Compl. ¶ 1.)

4. Meta Platforms Technologies, LLC, is a Delaware limited liability company and subsidiary of Meta Platforms Inc. with its principal place of business in Menlo Park, California. Meta Platforms, Inc. is the sole member of Meta Platforms Technologies, LLC. Plaintiff's complaint incorrectly identifies Meta Platforms Technologies, LLC as a limited liability company organized under the laws of the State of Colorado with a principal place of business in Menlo Park, California. (*Id.* at ¶ 3.)

5. Upon information and belief, Plaintiff Allison Takacs is an individual domiciled in the State of Illinois.

6. Upon information and belief, Plaintiff seeks damages in excess of \$75,000. Plaintiff's complaint seeks damages for personal injuries to her head and face as well as pecuniary damages. Plaintiff's complaint alleges damages exceeding the Circuit Court of Cook County Law Division jurisdictional limit of \$50,000 dollars in each of the wherefore clauses for each of the six counts asserted. (*Id.* at ¶¶ 7, 8, 12, 16, 21, 25, 29, and 34.)

7. As such, this is a civil action between citizens of different states and the amount in controversy exceeds \$75,000, exclusive of interest and costs, and this Court has original jurisdiction under 28 U.S.C. § 1332. Accordingly, Defendants may remove to this Court pursuant to 28 U.S.C. § 1441.

8. Venue is proper because the United States District Court for the Northern District of Illinois, Eastern Division, is the district and division embracing the place where the state court action is pending, *i.e.*, Cook County, Illinois.

9. As required by 28 U.S.C. § 1446(d), a copy of this Notice is being filed contemporaneously with the Clerk of the Circuit Court of Cook County and served upon opposing counsel.

DATED: February 24, 2023

Respectfully submitted,

META PLATFORMS INC., and
META PLATFORMS TECHNOLOGIES LLC

/s/ Edward Casmere

Patricia Brown Holmes

Edward Casmere

Meghan J. Wood

RILEY SAFER HOLMES & CANCILA LLP

70 W. Madison Street, Suite 2900

Chicago, Illinois 60602

(312) 471-8700 (tel)

(312) 471-8701 (fax)

ecasmere@rshc-law.com

pholmes@rshc-law.com

mwood@rshc-law.com

CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2023, I caused **Meta Platforms, Inc. and Meta Platforms Technologies, LLC's Notice of Removal** to be electronically filed using the CM/ECF system. Additionally, I emailed a true and correct copy of the same to:

Attorney for Plaintiff
Eric H. Check
The Law Offices of Eric H. Check
161 North Clark Street, Suite 2550
Chicago, IL 60601
office@echecklaw.com.

/s/ Edward Casmere
